

**DECLARATION IN SUPPORT OF PLAINTIFF'S REPLY TO TWITTER, INC.'S
OBJECTION TO PLAINTIFF'S MOTION TO DECLARE TWITTER'S COMPUTER
NETWORK A PUBLIC FORUM UNDER LAW**

Case #: 1:20-cv-00536-SM

Plaintiff, proceeding anonymously as Sensa Verogna, provides as follows:

DISTRICT OF NH
2020 JUL -6 P 9:07
24 HOUR DEPOSITORY

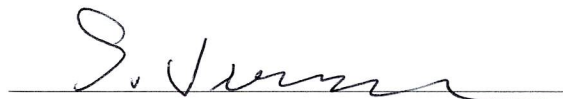
I, Sensa Verogna, hereby declare as follows:

1. I am a New Hampshire resident over eighteen and have personal knowledge of facts below. If called upon to testify, I could and would testify competently as to the matters contained herein.

2. The resident States of all information described in the PLAINTIFF'S REPLY AND MEMORANDUM OF LAW TO TWITTER, INC.'S OBJECTION TO PLAINTIFF'S MOTION TO DECLARE TWITTER'S COMPUTER NETWORK A PUBLIC FORUM UNDER LAW, were obtained by public records conducting google searches and the relevant government and public sites.

3. Attached EXHIBIT A, is a collection of Twitter Inc.

I declare under penalty of perjury that the foregoing is true and correct. Signed this 6th day of July 2020 in the State of New Hampshire.



/s/ Anonymously as Sensa Verogna

SensaVerogna@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of July 2020, I have contracted the foregoing Declaration, to be served in hand, directly to the agent of record for Twitter Inc., The Corporation Trust Company Corporation, Trust Center, 1209 Orange Street, Wilmington, DE 19801.

EXHIBIT A- Twitter Public Policy, @Policy

CONSTITUTIONAL ISSUES

Twitter Public Policy

This EO is a reactionary and politicized approach to a landmark law, protects American innovation and freedom of expression, and is underpinned by democratic values. Attempts to unilaterally erode it threaten the future of online speech and internet freedoms.

EXHIBIT A-1

Twitter Public Policy

We stand with and journalists around the world who are being persecuted for doing their jobs and holding power to account. Governments should not impinge on the fundamental values of a

It must end now.

EXHIBIT A-2

Twitter Public Policy

That's why we've joined 200+ organizations and industry peers in urging the US Congress¹¹ to prioritize access to broadband in their next stimulus package.

Joint Letter to Congress on Broadband in Stimulus Bills
[Public Knowledge

EXHIBIT A-3

Twitter Public Policy

Twitter stands with the entire LGBTQ community today and every day. Together, our voices will not be silenced.

You belong here.

EXHIBIT A-4

Twitter Public Policy

Whether it's reporting from the front lines of conflict or in the throes of a social justice movement, what journalists bring to us from every corner of the world is brave analysis and facts - of which, we couldn't be without.

EXHIBIT A-5

Facebook Newsroom

Facebook Joins Other Tech Companies to Support the Christchurch Call to Action

EXHIBIT A-6

Twitter Public Policy

On this , a reminder that at Twitter we believe privacy is a fundamental right, not a privilege. Learn more about our privacy policy here:

EXHIBIT A-7

IMMIGRATION ISSUES

Twitter Public Policy

At Twitter, we believe diversity is a source of strength and continue to advocate for sound US policies like . We're joining 140+ US companies and associations today in an amicus brief to the Supreme Court to support .

EXHIBIT A-8

Twitter Public Policy

To mark , on June 20th, let the world know that you stand by tweeting using the hashtags below.

The hashtags have been translated into 12 different languages to increase the reach of this important conversation.

EXHIBIT A-9

Twitter Public Policy

Statement on US high-skilled immigration proclamation:

"This proclamation undermines America's greatest economic asset: its diversity. People from all over the world come here to join our labor force, pay taxes, and contribute to our global competitiveness on the world stage.

EXHIBIT A-10

Twitter Public Policy

"Unilaterally and unnecessarily stifling America's attractiveness to global high-skilled talent is short-sighted and deeply damaging to the economic strength of the United States." —

EXHIBIT A-11

Twitter Public Policy

make us better.

Thank you to the US Supreme Court for affirming our belief that our diversity is a source of strength, and should be here to stay.

Twitter Public Policy

At Twitter, we believe diversity is a source of strength and continue to advocate for sound US policies like #DACA. We're joining 140+ US companies and associations today in an amicus brief to the Supreme Court to support #Dreamers.

[cnbc.com/2019/10/04/maj...](https://www.cnbc.com/2019/10/04/maj...)

EXHIBIT A-12

Twitter Public Policy

There is broad bipartisan support to and the United States Congress must act on a permanent solution. and stand with alongside 100+ US businesses and industry leaders. Learn more here:

EXHIBIT A-13

Twitter Public Policy

Collecting social media identifiers from visa applicants, including personal Twitter handles, has a chilling effect on that conversation. For these reasons, we remain strongly opposed to the U.S. Department of State's social media registration requirements.

EXHIBIT A-14

HUMAN RIGHTS ISSUES

Twitter Public Policy

We hope 2020 brings more openness & willingness from governments to permit & empower public conversation online. At Twitter, we'll continue to

EXHIBIT A-15

Twitter Public Policy

2019 has been an historic year of public activism, protest, and holding power to account. From Hong Kong to Venezuela and beyond, we're humbled to stand shoulder to shoulder with activists and NGOs who use Twitter to fight for our

EXHIBIT A-16

Twitter Public Policy

Empowering voices to join the public conversation is core to Twitter's mission.

It is a mission that we celebrate on #HumanRightsDay — and strive to carry out every day.

EXHIBIT A-17

VOTING

Twitter Public Policy

The is a vital, participatory process. We're working w/ to ensure the conversation around this civic event remains healthy, including the launch of a search prompt to point people to the authoritative source of information.

EXHIBIT A-18

Twitter Public Policy

It's more important than ever that those who wish to vote have the option to do so on or before Election Day. We support along with dozens of other businesses to ensure everyone knows their voting options ahead of the 2020 US elections. ¹¹

EXHIBIT A-19

WORLD POLITICS

Twitter Public Policy

As month comes to a close, we supported the to answer FAQs on how to deal with the anxieties and mental health issues people are facing during .

See below for guidance and key resources from

EXHIBIT A-20

Twitter Public Policy

On Twitter, there is a critical mass of:

- expert organizations
- official government accounts
- health professionals and
- epidemiologists

Our goal is to elevate & amplify the right message from the right source.

EXHIBIT A-21

Twitter Public Policy

A friendly reminder to the US Congress that we still support strong protections.

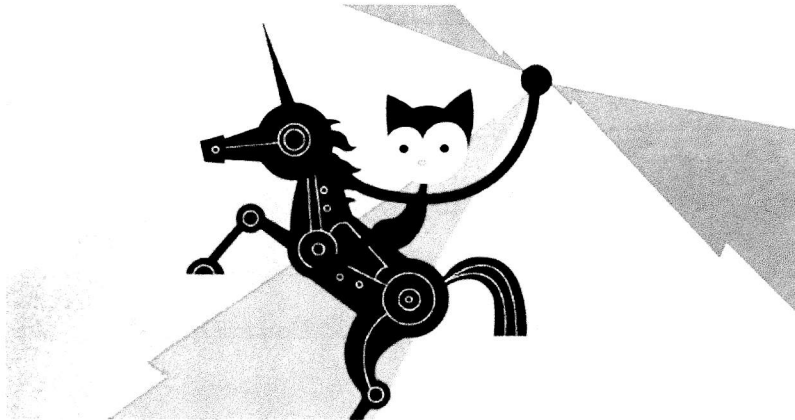
Twitter Public Policy

Thank you to Members of Congress for introducing and supporting legislation today to restore strong #NetNeutrality protections for Internet users and innovators. We look forward to continuing to work with Congress in a bipartisan manner on this critical Internet issue.

EXHIBIT A-22

EFF

Today, the House of Representatives passed the Act, which would give the majority of Americans what they want: strong protections. It's time to tell the Senate to follow suit!



Victory: The House of Representatives Passes Net Neutrality

EXHIBIT A-23

ENVIRONMENTAL ISSUES

Twitter Public Policy

From DIY projects ⁴⁶ in your community to volunteering your time and talents ⁴⁷ — there are numerous ways for people to get involved, even while we

Join the conversation using [#ClimateAction](#) as we come together to fight for the future of our planet.

EXHIBIT A-24



jack @realDonaldTrump
Thank you Prime Minister [@JustinTrudeau](#) for the conversation this afternoon! Appreciate your use of Twitter to reach the people of Japan directly, and your leadership on issues facing the world such as climate change. 🇺🇸 🇯🇵

EXHIBIT A-25

Twitter Public Policy

As we work to address the critical needs of our planet, we know we're better together, standing in partnership with a diverse coalition:

EXHIBIT A-26

OTHER POLITICAL ISSUES

Twitter Public Policy

Thank you for your insight and humor, Secretary Albright.

You're welcome to join our team any time.

EXHIBIT A-27

Twitter Public Policy

As partners of the bipartisan Partnership Challenge, we look forward to continuing to work together to ensure equal access to 21st-century opportunities for all.

The Black Caucus

The third annual #HBCUSTEAM Day of Action officially kicks off today.

The @TheBlackCaucus is proud support our Member @RepAdams Founder and Co-Chair of the HBCU Caucus to welcome the 102 #HBCUs to Capitol Hill.

#HBCUStrong

EXHIBIT A-28



Beto O'Rourke

Twitter · July 1, 2020 · 1.1K Retweets

Leaving millions of weapons of war on the streets because Trump and McConnell are... at least pretending to be open to reforms?

That calculation and fear is what got us here in the first place. Let's have the courage to say what we believe and fight for it.

EXHIBIT A-29



Joe Biden

Twitter · June 29, 2020 · 1.1K Retweets

Since 1973, over 160 individuals in this country have been sentenced to death and were later exonerated. Because we can't ensure that we get these cases right every time, we must eliminate the death penalty.

EXHIBIT A-30



Joe Biden

Twitter · June 29, 2020 · 1.1K Retweets

Donald Trump wants to declare this health crisis over and unemployment solved so that he can get back to his campaign rallies. But he's wrong — on both fronts.

We need a president who will actually do the work needed to get us through these crises.

EXHIBIT A-31



Kamala Harris

Twitter

Absolutely heartbreaking. Summer Taylor was only 24-years-old, peacefully protesting for Black Lives Matter when they were struck by a car. Thinking of their family during this difficult time and everyone in the movement today.



EXHIBIT A-32

Facebook · July 6, 2020 · Public



Matt B.

A: she's a member of the Democratic party; B: the DSA stands for Democratic Socialists of America; NOT a communist organization.

If you're going to try to smear, at least try to be accurate.

Facebook · July 6, 2020 · Public

Facebook · July 6, 2020 · Public



Matt B.

Someone needs to go back to school. Go research the difference between Social Democrats and socialism.

Knowledge is power.

Facebook · July 6, 2020 · Public

Facebook · July 6, 2020 · Public

Facebook · July 6, 2020 · Public

Facebook · July 6, 2020 · Public



OFMI

Facebook · July 6, 2020 · Public

As a veteran, will Representative Gabbard have the courage to denounce fascist organizations in roles like the RSS, which provides street-soldiers to the ruling B.P. party? Will she return campaign donations given by Overseas Friends of B.P.P?

EXHIBIT A-33